

**EXHIBIT A
ROBIN TERRAZAS AFFIDAVIT**

AFFIDAVIT

"My name is Robin Terrazas; I am over the age of eighteen, and am capable of providing this statement and affidavit.

"I am providing this statement and affidavit of my own personal knowledge, freely and willingly, as part of a lawsuit filed by the Albert Sidney Johnston chapter, No. 2060 against the City of San Antonio.

"I am the President of the Albert Sidney Johnston chapter No. 2060. I have held that position since 2016. As President, I am responsible for the meetings and the various committees, as well as spokesman for the chapter. The ASJ chapter No. 2060 succeeded to the Barnard E. Bee chapter in 1972. When Barnard Bee dissolved in 1972, the last president of that chapter, Mrs. Oldham (Oldom), and two other members visited our chapter and presented a certified copy of the city ordinance giving us the right to use the land in the center of Travis Park. The BEB chapter gave us that Ordinance in case any problem might come up in the future. Our chapter understood this discussion to mean a verbal agreement that we assume their interests in the Travis Park monument and in the cemetery on the east side of San Antonio.

"Attached is an accurate copy of our minutes from 1972 which reflect that Mrs. Oldham (Oldom) would attend our meeting. These minutes are dated Jan. 13, 1972. Attached to my statement are correct copies of those minutes. Those minutes state:

"Mrs. L.J. Gittinger reported that Mrs. Oldham, President of Barnard E. Bee Chapter and two members would like to attend our January ___ meeting and give a report on the monument in Travis Park. This Chapter is disbanding and she feels our Chapter should have this information. A motion was made that we invite Mrs. Oldham and two guests to our January meeting."

Terrazas Exhibit 1, p. 1. Attached to my statement is a correct copy of those minutes. We keep those minutes in the normal course of our chapter. They would have been accurate at the time they were accepted.

"Then, at the Jan. 20, 1972 meeting. Mrs. Oldham did attend. She spoke at the ASJ meeting. She spoke about the Confederate memorial in the center of Travis Park. She talked about how several years before, H.B. Zachry Co. planned to build an underground parking garage in Travis Park. San Antonio City Council gave permission to the Daughters of the Confederacy to build a memorial in the park. The minutes provide:

"Several years ago, H.B. Zachry Co. planned to build an underground parking lot at this site. The Daughters protested. Mrs. Oldham presented a certified copy of this ordinance to the Chapter for safe keeping if something should arise in the future."

Terrazas Ex. 2, p. 2. Attached to my statement is a correct copy of those minutes. We keep those minutes in the normal course of our chapter. They would have been accurate at the time they were accepted.

"Our chapter, the ASJ chapter, agreed to accept the certified copy of the City ordinance. This acceptance represented a verbal agreement from her chapter to ours.

"Also attached to my statement is a true and correct copy of the City of San Antonio Ordinance dated March 27, 1899. I believe this was the same copy which Mrs. Oldom (her name is spelled two different ways depending on the source) presented to our chapter. I was given this copy by Theresa Gold. She was president of the chapter through the 1990's. She is now in a nursing home. This copy is attached as Terrazas Exhibit 3. This is an accurate copy of the same paper given me by Mrs. Gold. The copy she gave me is legal size, or 8.5 inches by 14 inches. The paper she gave me does not appear to be the original certified copy, but a copy of the certified copy. The certified portion is dated Dec. 10, 1953.

"The March 27, 1899 ordinance provides:

"Petition of the Daughters of the Confederacy for permission to erect a monument in Travis park. In this connection Ald. Rheiner introduced the following ordinance:

"Be it ordained by the City Council of the City of San Antonio that permission be and is hereby granted to the Daughters of the Confederacy to use the amount of land petitioned for in the center of said Travis Park and that the City Engineer be hereby ordered to survey and define said

plat of land at once.

The ordinance was adopted unanimously.”

Terrazas Exhibit 3.

“The Ordinance reflects that the City gave the use of the land beneath the monument to the ‘Daughters of the Confederacy.’ I believe this means the City gave the use of the land to the Daughters of the Confederacy. That is what Mrs. Oldom said. The ASJ chapter is part of the Daughters of the Confederacy, as was the BEB chapter.

“The Barnard E. Bee chapter could have given that Ordinance to any chapter in the area. But, they gave it to our chapter. They expected us to take care of the monument the same way they would have. We agreed to take care of it as best we could. I hope we have done so.

“Later, the Barnard E. Bee chapter also transferred its cemetery deed to us. Mrs. Oldom and the other two members joined our chapter later that same year. A copy of that deed is also attached to my statement. This is the Confederate cemetery on the east side of San Antonio. Other people are buried there, too. But, it started as a cemetery for Confederate veterans and their families, back when many families of Confederate veterans did not have money for burial. A copy of this deed is attached as Terrazas Exhibit 4. This is a correct copy of the deed as maintained in our records since the deed was signed by Mrs. Oldom. The deed is dated March 25, 1976.

“On Aug. 4, I sent Jacquelyn Salvador a copy of the 1899 Ordinance, in which the City gave us use of the land beneath the monument. She works in Municipal Archives. She had asked me about ownership of the monument. I sent her information about the Barnard Bee chapter and explained that we succeeded to the Barnard Bee chapter.

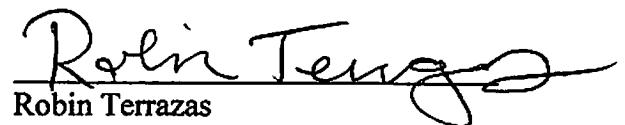
“Also attached is a copy of the minutes from the 1972 UDC Convention. The second page indicates that Mrs. Fred Oldom turned in the charter for the Barnard E. Bee chapter. This is a true and correct copy of those minutes which I have in my possession. These minutes are records which belong to the Albert Sidney Johnston chapter. We have maintained these documents since we received them. See Terrazas Exhibit 5.

“The UDC Handbook for Texas states that when a chapter disbands, it must send its charter to the state headquarters, which we refer to as ‘Texas Division.’ But, the

chapter can then limit what goes to state. The BEB chapter limited that by giving to the ASJ chapter their interest in the Travis Park monument and the cemetery. See attached at Terrazas Exhibit 6 a letter written by our state head, Eva Long saying the state headquarters agrees that the Bee chapter transferred their interests in the Travis Park memorial to the ASJ chapter. Ms. long states that as far as state headquarters is concerned, the ASJ 2060 chapter owns the Confederate memorial and the time capsule.

"I declare under penalty of perjury that the above statement is true and correct. I have been given an opportunity to review this statement and to make any necessary changes."

Signed on 10-15, 2018.



Robin Terrazas

President

Albert Sidney Johnston Chapter No.
2060

TERRAZAS EXHIBIT 1
JAN. 13, 1972 JOHNSTON CHAPTER MINUTES

1, 1972 at 10:00 a. m. The Executive Board
and Chapter # 2060, United Daughters of the
Confederacy, were read by the Secretary.
The auditor reported \$ 366.92 in the General Fund,
\$ 1,541.19 in the Cemetery Fund,
and \$ 15.00. She has books on hand, not
for sale. The highlights of a newsletter from the Division
are enclosed tree. The Division won the following awards:
1. for the largest amount for # 13 Pin. 2. for registering
the most new members. 3. The Lucy C. Renfroe award for registering
most grand-daughters. 4. for purchasing most ancestral
records. 5. for Chapter having largest number subscribers to the U.D.C.
newspaper Davis Chapter # 1637, Houston, Texas. 6. Second
place in the Randolph Relief Fund.
Chairman for the Book Review, reported
that chairmen held a meeting before Christmas to make final
interviewed Mrs. Cochran and there will be a picture
in all city papers. Articles will also be sent to the
Gulf Coast and Northside Recorder. She reported selling eight
complimentary tickets.
Mrs. Hamilton, ticket chairman, thanked Mrs. Gerlich and
for addressing envelopes. She reported the cost of the
\$ 5.00 for 350 tickets. She has turned over \$ 92.00 to the
has received an additional \$ 6.00 today. Mrs. Hamilton
will sell additional tickets at the door. Mrs. Skeggs
will collect tickets at the door.
Mrs. Gerlich will send invitations to the Presidents of the Breton
and Barnard E. Bee Chapters, also the Daughters of the Republic
and other organizations and will include a complimentary
for the Presidents.

Mrs. I. J. Gittinger reported Mrs. Oldham, President of Chapter and two Chapter members would like to attend our meeting and give a report on the monument to Lincoln Park. This is a naming and she feels our Chapter should have this name. Motion was made that we invite Mrs. Oldham and two others to our meeting. The motion was seconded and carried.

The January meeting will be held at the 4th Floor Conference Room, 1000 University Street, Seattle, Washington, on January 10, 1967, at 10:00 A.M. The meeting will be open to the public.

REGULAR MEETINGS (cont.)

66

Jas

has membership papers but has not returned them as yet
A short informal discussion was held relative to the
chancery next year - especially regarding setting up
meetings and following the Historian General's program
during at this time.

There being no further business, the meeting adjourned.
Eleven members were present. They were: Mesdames G.
Zenshorn, Gerlich, Hamilton, Florentin, Schraer and
Zeman and Allen.

ASJ 00003

Mrs. Willard M.

Mr. S. William M.
Recording Secretary

* * * * *

REGULAR MEETING

TERRAZAS EXHIBIT 2
JAN. 20, 1972 JOHNSTON CHAPTER MINUTES

MEMORANDUM (cont'd.)

and numbered 1000 projected out for the year. A
total of 1000 members were present at the
meeting and following the election of
officers and following the election of
officers at this time.

There being no business transacted,
elected officers were present. The
elected officers are present. The
members present, 1000, total.
Signature of 42142.

1000 members

1000 officers

1000 total

REGULAR MEETING

Albert Sidney Johnston Chapter # 2060. Regular
Meeting, set on FRIDAY, January 20, 1972 at 1000
hours. Also Constance Allen with the President, Mrs.
H. L. Williams.

The meeting was opened with the Ritual and Prayers
Pledge of Allegiance and Salutes to the Texas and USA
respectively.

Minutes of the previous meeting were read and approved.
Loyallie Bone, Treasurer, reported \$ 762.92 in
\$ 697.00 in the Scholarship Fund and \$ 77.26 in the
Bank or hand \$ 1,437.18.

Felicities of the member from the Division
Committee, were read. The Division won the Gold
Medal in the largest amount for 13 P.M. 2. Recruit
members 3. The Loyallie Bone award for
Greatest, 1971-1972. 4. For purchasing most
books for the library. 5. For having
the largest number subscribers to
the publication DFW Chapter # 1637, Houston.

The following officers and their term of office
were elected to co-operate with the
Division.

(cont.)

arded the outstanding teacher award in Georgia last fall. Members enjoyed the slides and the commentary on the Atlanta mountains. Her program was most interesting.

Wardham, President of the Marksmen, spoke relative to the monument in Travis Park erected in 1899 by the City Council of San Antonio in honor of the soldiers and sailors of the Confederacy to escort the remains of Zachry Jr. from the San Antonio airport to its parking lot at this site. The Marksmen presented a certified copy of this ordinance to Mrs. Cross. Keeping in mind something should arise in the future, being no further business, the meeting adjourned.

Mrs. William W. Cross

Mrs. William W. Cross
Recording Secretary

February 17, 1972

The regular meeting was held prior to the Regular

TERRAZAS EXHIBIT 3
COPY OF DEC. 13, 1953 CERTIFIED COPY OF
ORDINANCE

REGULAR MEETING OF THE CITY
COUNCIL OF THE CITY OF SAN
ANTONIO, MONDAY, MARCH 27, 1899

PRESENT: Mayor Marshall Hicks
Aldermen Alexander, Barker, Davis, Lamm, Mahncke,
Munne, O'Connor, Piper, Rheiner, Richter, Surkey
and Thiele

Petition of the Daughters of the Confederacy for permission
to erect a monument in Travis Park. In this connection Ald.
Rheiner introduced the following ordinance.

Be it ordained by the City Council of the City of San Antonio
that permission be and is hereby granted to the Daughters of
the Confederacy to use the amount of land petitioned for in the
center of said Travis Park and that the City Engineer be hereby
ordered to survey and define said plat of land at once.

The ordinance was adopted unanimously.

On motion the Council adjourned.

APPROVED:

/s/ Marshall Hicks
Mayor

ATTEST:

/s/ W. W. Johnson
City Clerk

STATE OF TEXAS
COUNTY OF BEXAR
CITY OF SAN ANTONIO } ss.

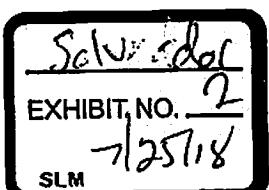
CERTIFIED COPY

The undersigned, the City Clerk of the City of San Antonio, in the State and County aforesaid, doth, 1953, certify that the foregoing is a true copy of the resolution of the City Council of San Antonio, Texas, passed on the 27th day of March, 1899, for the purpose aforesaid.

GIVEN under my hand and the official seal of the City of San Antonio, on the 10th day of December, A. D. 1953.

I SEAL

Elmer W. Starrett



TERRAZAS EXHIBIT 4
MARCH 25, 1975 DEED

THE STATE OF TEXAS

COUNTY OF BEXAR

652260

NY-473 64747 1811 ac 414

350

KNOW ALL MEN BY THESE PRESENTS:— I

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THAT BARNARD E. BEE CHAPTER NO. 86, also known as B.E.B. CHAPTER NO. 86, United Daughters of the Confederacy, an unincorporated association, acting herein by and through MRS. MARY (FRED) OLDOM, of Bexar County, Texas, the last duly elected and acting President of said Barnard E. Bee Chapter before said Chapter became disbanded, for and in consideration of the sum of Ten (\$10.00) Dollars, and other good and valuable consideration, the receipt whereof is hereby acknowledged and confessed, have BARGAINED, SOLD AND FOREVER QUITCLAIMED, and by these presents do hereby BARGAIN, SELL AND FOREVER QUITCLAIM unto ALBERT SIDNEY JOHNSON Chapter No. 2050, United Daughters of the Confederacy, of San Antonio, Bexar County, Texas, all the right, title and interest had by the said Barnard E. Bee Chapter No. 86, also known as B. E. B. Chapter, United Daughters of the Confederacy, of San Antonio, Texas, in and to the following described cemetery lots, in San Antonio, Texas, to wit:

All of Lots 85 and 96, in Section 4, of City Cemetery No. 4, more particularly described as follows: Beginning at the N.W. corner of said Lot No. 85; Thence South 54 feet; Thence East 30 feet; Thence North 54 feet; Thence West 30 feet to the place of beginning, and being the same property conveyed to B.E.B. Chapter, United Daughters of the Confederacy, by Marshall Hicks, Mayor of the City of San Antonio, Texas, on June 23rd, 1909, recorded in Vol. 430, Page 96, Deed Records of Bexar County, Texas, to which deed and the record thereof reference is here made.

TO HAVE AND TO HOLD all the right, title and interest which the said Barnard E. Bee Chapter, also known as B. E. B. Chapter No. 86, United Daughters of the Confederacy had in the above described property to Albert Sidney Johnson Chapter No. 2050, of San Antonio, Texas, United Daughters of the Confederacy, its successors and assigns forever, so long as either the successors or assigns of the said Barnard E. Bee Chapter No. 86, also known as B.E.B. Chapter No. 86, United Daughters of the Confederacy, shall have, claim or demand any right or title to said property or interests or any part thereof.

WITNESS at San Antonio, Texas, this 1st day of March, A.D.

BARNARD E. BEE CHAPTER NO. 86
B. E. B. CHAPTER NO. 86
DAUGHTERS OF THE CONFEDERACY

By Mrs. Mary (Fred) Oldom
Mrs. Mary (Fred) Oldom.

RECORDED RECORDING
All or part of the text on this page is not
legible. Please see the original document for the complete text.

TERRAZAS EXHIBIT 5
1972 UDC BOOK RE BEE CHAPTER

SIXTY-SIXTH ANNUAL CONVENTION



THE TEXAS DIVISION
UNITED DAUGHTERS
OF THE
CONFEDERACY
(INCORPORATED)

Austin, Texas October 3-4-5, 1972



Mr. & Mrs. W. M. Hedges
Wardrobe

THE DAUGHTERS OF THE CONFEDERACY

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BARNARD E. BEE CHAPTER, No. 86

SAN ANTONIO, TEXAS

Chartered: October 6, 1896

James A. Schnittker
Secretary, Texas Division, U.D.C.

REFERENCES

Using these forms—Barnard E. Bee Chapter No. 86, San Antonio.

E. W. Mitchell, President of The Texas Division, was notified
of the death of Mrs. Ramsey, Treasurer of The Texas Division.

Mme. Enzo Gonnella - Presidente

BRAXTON BRAGG CHAPTER, No. 2211

SAN ANTONIO, TEXAS

Chartered: July 20, 1954

Number of Members: 16

of regular Chapter meeting Third Sunday Afternoon, September

Parker, 126 Kennedy, San Antonio, 78209, President; Mrs. Parker, 126 Kennedy, San Antonio, 78209, Vice President; Mrs. Copeland, 151 Chichester, San Antonio, 78209, 2nd Vice President; Mrs. Flood, 1019 Burnett, San Antonio, 78202, 3rd Vice President; Mrs. Jane Alberthal, 2115 Leal, San Antonio, 78207, Recording Secretary; Mrs. Bea Copeland, Route 3, Box 165-D, San Antonio, 78218, Treasurer; Mrs. D. Jane Alberthal, 2115 Leal, San Antonio, 78207, Registrar; Mrs. Smith, 144 Cloverleaf, San Antonio, 78209, Historian; Mrs. Moore, 705 Topeka, San Antonio, 78210, Corresponding Secretary; Mrs. Louise Owens, 1807 Wright, Llano, 78643, Recorder of Crosses. Dues and assessments paid on 17 members by March 1, 1972.

being processed on three prospective members.
Contributed to Randolph Relief Fund.
Contributed to Randolph Scholarship Fund.

Chapter and \$5.00 Personal donation made to "Roaring Red" collection of Confederate emblems.

members subscribe to the "Roaring Reb" Mugazine.
of the members subscribe to U.D.C. magazine with four renewals.

... hours spent making Cancer Bandages, bed pillows and bed coats. Large sheets of newspaper print—proof to be brought to Convention.

3rd Vice President attends the Children of the Confederacy.

DAUGHTERS OF THE CONFEDERACY

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**SARNAUD E. BEE CHAPTER, No. 86
SAN ANTONIO, TEXAS**

**State Fire Marshal's Office
Fire Prevention Division, U.D.C.**

Mrs. Fred Oldom, President

**BRAZTON BRAGG CHAPTER, No. 2911
SAN ANTONIO, TEXAS**

Chartered: July 20, 1951

Number of Members: 16

and/or sweating. Third Stage

Our next regular Chapter meeting Third Sunday Afternoon, September

President: Mrs. Walt P. Jones, 1204 Kennedy, San Antonio, 78209. Vice President: Mrs. John F. Kennedy, San Antonio, 78209. 2nd Vice President: John W. Chiles Jr., San Antonio, 78209. 3rd Vice President: John J. Connelly, San Antonio, 78207. Recording Secretary: John C. Gandy, San Antonio, 78218. Treasurer: John C. Gandy, San Antonio, 78218.

ASJ 00025

**TERRAZAS EXHIBIT 6
FEB. 13, 2018 EVA LONG LETTER**



Eva Breed Long
Texas Division President
United Daughters of the Confederacy
375 Roy Breed Road
Dripping Springs, TX 78620-3506
elong1955@gmail.com, 512-689-7915

February 13, 2018

RE: Confederate Monument in Travis Park

To Whom It May Concern:

The Texas Division, United Daughters of the Confederacy, considers the Albert Sidney Johnston 2060 chapter to be the owner of the monument erected by its predecessor, Barnard E. Bee 86. The Barnard E. Bee 86 chapter raised money to design, build and erect a monument of an unknown soldier to be placed in Travis Park in memory of those husbands, fathers and sons who never returned home to their native Texas. The City of San Antonio declared an Ordinance on March 27, 1899 that gave the Daughters use of the land in Travis Park. The Ordinance, voted unanimously on by Mayor Hicks and the City Council at the time. The Barnard E. Bee 86 chapter disbanded in 1972 and allocated its assets, as desired, to the Albert Sidney Johnston 2060 chapter of San Antonio. On January 20, 1972 the president of the Barnard E. Bee 86 chapter presented the president of the Albert Sidney Johnston 2060 chapter with a certified copy of the Ordinance, which would be considered a transfer of property.

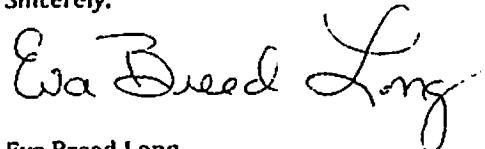
According to the Bylaws of the Texas Division, United Daughters of the Confederacy, Article VIII, Disbanded and Defunct Chapters, Section 1, b. "Notification shall be accompanied by the original Charter, plus all assets (unless otherwise limited), and records of the Chapter. These assets and records become the property of the Division."

We believe the "unless otherwise limited" to include the transfer of assets from the Barnard E. Bee 86 chapter to the Albert Sidney Johnston 2060 chapter and that included, but not limited to, the monument, its base and contents included in either the monument or base, said Time Capsule.

Should further information need to be provided this court, please let us know and we will do our due diligence in providing that information.

Thank you for your consideration in this matter.

Sincerely,



Eva Breed Long
Texas Division President
2016-2018